

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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JENNY RUBIN,  
DEBORAH RUBIN,  
DANIEL MILLER,  
ABRAHAM MENDELSON  
STUART HERSH,  
RENAY FRYM,  
NOAM ROZENMAN,  
ELENA ROZENMAN  
and TZVI ROZENMAN,

Case No: 11-mc-00039-P1

**NOTICE OF**  
**PETITION FOR TURNOVER**

Petitioners/Judgment-Creditors,

- against -

HAMAS - ISLAMIC RESISTANCE MOVEMENT  
(a.k.a. "Harakat Al-Muqawama Al- Islamiyya"),

Judgment-Debtor,

-and-

JP MORGAN CHASE BANK, N.A.,  
HSBC BANK, U.S.A., N.A.,  
CITIBANK, N.A.,  
and MORGAN STANLEY DW, INC.,

Respondents /Garnishees.

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PLEASE TAKE NOTICE that upon the annexed Petition for Turnover and upon the pleadings and proceedings heretofore had herein, Petitioners/Judgment Creditors Jenny Rubin, Deborah Rubin, Daniel Miller, Abraham Mendelson, Stuart Hersh, Renay Frym, Noam Rozenman, Elena Rozenman and Tzvi Rozenman hereby move this Court for an Order:

- a) PURSUANT to Fed.R.Civ.P. 69, New York CPLR §§ 5225 and 5227, and § 201 of TRIA, directing the Respondents-Garnishees to turn over to the Petitioner/Judgment-Creditors, by delivery to their counsel Robert J. Tolchin, Esq., all blocked assets of the Holy Land Foundation for Relief and Development in the possession of Respondents-Garnishees; and
- b) GRANTING such other and further relief as is just and proper under the circumstances.

Dated: New York, New York

September 16, 2011

Yours,

THE BERKMAN LAW OFFICE, LLC  
*Attorneys for the Petitioners / Judgment-Creditors*

by: /s/ Robert J. Tolchin  
Robert J. Tolchin

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